

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FRONTIER COMMUNICATIONS OF  
NEW YORK, INC.

Plaintiff,

- against -

INTERNATIONAL BROTHERHOOD OF ELECTRICAL :  
WORKERS, AFL-CIO, LOCAL UNION 503, :

Defendant.

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:  
: **NOTICE OF DEFENDANT'S**  
: **MOTION TO DISMISS**  
: **PLAINTIFF'S**  
: **COMPLAINT PURSUANT**  
: **TO FED. R. CIV. P. 12(b)(6)**

: 07-CV-10327  
: (Lynch, J.)  
: (Eaton, M.J.)  
:  
:----- X

PLEASE TAKE NOTICE that upon the attached declaration of Vincent F. O'Hara, Esq., the exhibits annexed thereto, the Defendant's supporting memorandum of law and Plaintiffs' November 14, 2007 Complaint, and pursuant to Federal Rule of Civil Procedure 12(b)(6) and Local Rules 6.1 and 7.1 of the Southern District of New York, Defendant International Brotherhood of Electrical Workers, AFL-CIO, Local Union 503 ("IBEW 503"), by their attorneys, hereby request that all opposing affidavits and answering memoranda be served upon the undersigned movant within ten (10) business days after service of the moving papers in accordance with Local Rule 6.1(b).

Dated: New York, New York  
January 18, 2008

Respectfully submitted,

Holm & O'Hara LLP  
Vincent F. O'Hara  
Marion M. Lim  
3 West 35<sup>th</sup> Street, 9<sup>th</sup> Floor  
New York, New York 10001  
(212) 682-2280

HOLM & O'HARA LLP  
*Attorneys for Defendants*  
*International Brotherhood of Electrical*  
*Workers, AFL-CIO, Local Union 503*

By: /s/Vincent F. O'Hara  
Vincent F. O'Hara

TO: Thomas M. Beck, Esq.  
JONES DAY  
*Attorneys for Plaintiff Frontier  
Communications of New York, Inc.*  
51 Louisiana Avenue, N.W.  
Washington, D.C. 20001  
(202) 879-3939

Wendy C. Butler, Esq.  
JONES DAY  
*Attorneys for Plaintiff Frontier  
Communications of New York, Inc.*  
222 East 41<sup>st</sup> Street  
New York, New York 10017  
(212) 326-3939

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